

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re: : Chapter 11
: :
LEHMAN BROTHERS HOLDINGS INC., et al., : 08-13555 (JMP)
: :
Debtors. : (Jointly Administered)
-----X

**SEVENTH SUPPLEMENTAL AFFIDAVIT OF ROBERT JAY MOORE
IN CONNECTION WITH RETENTION AND EMPLOYMENT OF
MILBANK, TWEED, HADLEY & M^cCLOY LLP AS COUNSEL TO
OFFICIAL COMMITTEE OF UNSECURED CREDITORS**

STATE OF CALIFORNIA)
) SS.:
COUNTY OF LOS ANGELES)

ROBERT JAY MOORE, being duly sworn, says:

1. I submit this Seventh Supplemental Affidavit (the "Affidavit") on behalf of Milbank, Tweed, Hadley & M^cCloy LLP ("Milbank") as a supplement to the Initial Affidavit, sworn to on October 21, 2008, the First Supplemental Affidavit, sworn to on November 13, 2008, the Second Supplemental Affidavit, sworn to on January 30, 2009, the Third Supplemental Affidavit, sworn to on May 29, 2009, the Fourth Supplemental Affidavit sworn to on July 20, 2009, the Fifth Supplemental Affidavit, sworn to on December 23, 2009, and the Sixth Supplemental Affidavit, sworn to on March 18, 2010 (collectively, the "Prior Affidavits"),¹ pursuant to sections 328 and 1103(b) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (as amended, the "Bankruptcy Code"), rules 2014 and 5002 of the Federal Rules of Bankruptcy Procedure, and rule 2014-1 of the Local Bankruptcy Rules for the Southern District

¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Prior Affidavits or the Application Of Official Committee Of Unsecured Creditors Of Lehman Brothers Holdings Inc., et al., Under 11 U.S.C. § 1103 And Fed. R. Bankr. P. 2014 And 5002, For Order Authorizing Retention And Employment Of Milbank, Tweed, Hadley & M^cCloy LLP As Counsel, Effective As Of September 17, 2008, dated October 21, 2008 (the "Application") (Docket No. 1165).

of New York, in connection with Milbank's retention as counsel to the Official Committee of Unsecured Creditors (the "Creditors' Committee" or the "Committee") of Lehman Brothers Holdings Inc. and its affiliated debtors in possession (collectively, the "Debtors" and, together with their non-Debtor affiliates, "Lehman") in the above-captioned chapter 11 cases (the "Chapter 11 Cases").

2. I am a partner in the Financial Restructuring Group of Milbank and a member of the Task Force² established to oversee the continuing process of identifying to the fullest extent possible all connections that Milbank, its attorneys, and its employees had in the past and presently have to the Debtors, Lehman, the Chapter 11 Cases, and the parties in interest in the Chapter 11 Cases and to gather the information required to complete this Affidavit. I have consulted with, and relied upon the input obtained from, the members of the Task Force, and I, or other members of the Task Force, have knowledge of all facts described herein.

3. Unless otherwise stated in this Affidavit, I have knowledge of the facts set forth herein and, if called as a witness, I would testify thereto.³ In preparing this Affidavit, I used the Milbank Disclosure Procedures outlined in the Initial Affidavit and, among other things, applied those procedures to parties that have filed notices of appearance and pleadings in the Chapter 11 Cases, a list of parties generated by Milbank's frequent internal inquiries, and a list prepared by the Debtors' counsel and provided to Milbank.

Milbank's Retention

4. The Court authorized Milbank's retention as counsel for the Committee in these Chapter 11 Cases pursuant to the Final Order Under 11 U.S.C. § 1103 And Fed. R. Bankr.

² The current members of the Task Force are David S. Cohen, L. Douglas Harris, Robert J. Moore, and Risa M. Rosenberg.

³ Certain of the disclosures set forth herein relate to matters not within my personal knowledge, but rather within the personal knowledge of other attorneys and employees at Milbank, and are based on information provided by them to the Task Force.

P. 2014 And 5002, Authorizing Retention And Employment Of Milbank, Tweed, Hadley & McCloy LLP As Counsel To Official Committee Of Unsecured Creditors Of Lehman Brothers Holdings Inc., et al., Effective As Of September 17, 2008, entered on November 21, 2008 (Docket. No. 1654).

5. In connection with its retention in these Chapter 11 Cases, Milbank has monitored, and will continue to monitor, its connections with the Debtors, their creditors, and other parties in interest, as well as their respective attorneys and accountants. As set forth in the Prior Affidavits, Milbank intends to continue to file supplemental affidavits regarding its retention as and if any additional relevant information comes to its attention.

Milbank's Additional Connections with Debtors and Parties in Interest

6. Based upon the information gathered by the Task Force using the Milbank Disclosure Procedures, to the best of my knowledge the following sets forth the connections, in addition to those disclosed in the Prior Affidavits, that Milbank, its attorneys, and its employees have with regard to the Debtors, their creditors, and other parties in interest in these Chapter 11 Cases as of the date of this Affidavit.

Connections with the Debtors, Counsel, etc.

7. Except as set forth below and in the Prior Affidavits, to the best of my knowledge: (a) no Milbank attorney has been, within two years before the date of filing of the Debtors' petitions, a director, officer, or employee of any of the Debtors as specified in subparagraph (C) of section 101(14) of the Bankruptcy Code, and (b) the attorneys of Milbank (i) do not have any connection with the Debtors, the Debtors' creditors known to Milbank, or any other known party in interest, or their respective attorneys and accountants and (ii) consistent with Bankruptcy Code section 1103(b), do not represent in connection with these Chapter 11 Cases any other entity having an adverse.

8. Except as set forth in this paragraph, and the related paragraphs in the Prior Affidavits, to the best of my knowledge, no attorney or employee of Milbank is related to counsel or accountants to the Debtors and other parties in interest or to the courts of the Southern District of New York. In addition to the matters set forth in the Prior Affidavits, certain Milbank attorneys have relatives, spouses, or domestic partners who are employed by the counsel to the Debtors or other parties in interest or by the courts of the Southern District of New York, as follows: (i) the brother of a Milbank associate is a commodities trader with The Goldman Sachs Group, Inc.; (ii) the brother-in-law of a Milbank associate is a manager of a subsidiary of Inverness Medical Innovations, Inc.; (iii) the spouse of a Milbank associate is an attorney with Paul, Hastings, Janofsky & Walker LLP; (iv) a Milbank associate's cousin is an employee of the Bank of New York Mellon Corp.; (v) a Milbank associate's brother is an employee of WestLB AG; (vi) the nephew of a partner of Milbank has a job offer from White & Case LLP; (vii) the spouse of a Milbank associate works for Société Générale; and (viii) the father of a Milbank associate works for Deloitte & Touche LLP. Additionally, (i) a Milbank associate previously worked as a paralegal for Cravath, Swaine & Moore LLP and assisted in the representation of Deloitte & Touche LLP in a lawsuit filed by the shareholders of Adelphia Communications Corporation; (ii) a Milbank associate previously worked as a paralegal for Skadden, Arps, Slate Meagher & Flom LLP and assisted in that firm's long term representation of Citigroup, Inc.; (iii) a Milbank associate previously worked as a paralegal for Dewey Ballantine LLP; (iv) a Milbank associate previously interned in the Federal Home Loan Bank of Atlanta; (v) a Milbank associate previously worked as a paralegal for Davis Polk & Wardwell LLP; (vi) a Milbank associate previously worked for both Linklaters LLP and Skadden, Arps, Slate Meagher & Flom LLP; (vii) a Milbank associate is a former intern in the legal department of the Royal Bank of Canada; (viii) a Milbank associate formerly worked as a paralegal for Sidley Austin LLP; (ix) a

Milbank associate previously worked as consultant for Accenture; and (x) a Milbank associate previously worked as an intern for Metropolitan Life Insurance Company. Additionally, (i) an incoming Milbank associate previously represented Cascade Investment LLC as a swap counterparty in the Chapter 11 Cases; and (ii) an incoming Milbank associate, while associated with Morgan, Lewis & Bockius LLP, previously represented (a) the following parties in interest in connection with the Chapter 11 Cases or SIPA Proceedings: (i) Lehman Brothers International (Europe), (ii) various affiliates of BNP Paribas, (iii) Citadel Broadcasting Corporation, (iv) University of Florida Investment Corporation, (v) Cardif Assicurazioni SpA, (vi) Cardif Life Insurance Company, (vii) Cardif Property and Casualty Insurance Company, (viii) Cardif Lux International SA, (ix) Clifton Group Investment Management Company, (x) CooperNeff Master Fund I Segregated Portfolio Company SPC, (xi) Darnell Limited, Fischer Francis Trees & Watts, Inc., (xii) Meteor Asset Management Limited, (xiii) Prudential Investment Management - Fixed Income, (xiv) Julie Shapiro, (xv) Deutsche Investment Management Americas Inc. and (xvi) Schweizerische Unfallversicherungsanstalt; and (b) the following parties in interest in matters unrelated to the Chapter 11 Cases and SIPA Proceedings: (i) an affiliate of American Airlines, Inc., (ii) JPMorgan Chase Bank, N.A., (iii) Mellon Bank, N.A., (iv) Mitsubishi Corporation, (v) Philadelphia Museum of Art, (vi) Prudential Insurance Company of America, (vii) Sun Capital Partners, Inc., (viii) Wachovia Bank, N.A. and (ix) King Street Capital Management LLC. Additionally, a Milbank summer associate is a former intern to the Honorable Judge James M. Peck and the husband of a Milbank associate is a summer associate with Barclays Capital Inc. In each foregoing instance the applicable Milbank attorney and/or employee will not be assigned to any matters in these Chapter 11 Cases that involve the respective parties in interest, and has been advised in writing of, and directed to maintain, his or her duty of confidentiality with respect to client matters.

9. To the best of my knowledge, neither Milbank nor any attorney or employee at the firm is a creditor, an equity security holder, or an insider of the Debtors, except as described in the Application and Prior Affidavits.

10. As described in the Application and Prior Affidavits, Milbank has agreed not to seek to collect from Lehman, subject to approval by the Bankruptcy Court of its retention as counsel to the Committee, any amount owing to Milbank by Lehman for accrued and unpaid fees for services rendered or reimbursement for expenses incurred (whether or not billed) as of the Initial Petition Date. Without limiting the foregoing, Milbank reserves the right to seek payment directly from third parties who may be liable to pay such amounts with respect to the applicable transaction, but agrees that it shall not seek payment from any such third party to the extent that, to the knowledge of Milbank, such third party has a contractual right to seek reimbursement or indemnity from a Lehman Entity on account of a payment to Milbank. Milbank also reserves the right to retain financial advisors and other professionals retained by the Debtors in these Chapter 11 Cases on unrelated matters.

Connections with Creditors and Other Parties in Interest, Counterparties

11. Using information in the Database and by making specific inquiries of Milbank personnel, Milbank attorneys under the supervision of the Task Force verified that, except as set forth below and in the Prior Affidavits, Milbank does not represent in connection with these Chapter 11 Cases any entity known by Milbank to be a creditor of, or counterparty in a transaction with, the Debtors or other person or entity that has appeared as a creditor in these Chapter 11 Cases.

12. Upon information and belief, Milbank represents certain former employees and/or members of their immediate family in preparing wills or other estate planning matters in such persons' individual capacities.

13. Exhibit A sets forth a list of entities that were searched in connection with this Affidavit (the “Fifth Supplemental Potential Party List”), and includes entities that have appeared as creditors or parties in interest in the Chapter 11 Cases or related proceedings, or that have been involved in transactions and other matters involving the Debtors since the Initial Petition Date. Exhibit B to this Affidavit sets forth a list of the current and former clients of Milbank that was generated in connection with the Fifth Supplemental Potential Party List.⁴ To the extent that the interests of the Creditors’ Committee and a known Milbank client in an unrelated matter give rise to a conflict in respect of Lehman, Milbank either will procure a waiver from such client or the conflicts matter will be handled by Conflicts Counsel. If any litigation arises between the Creditors’ Committee and any of these clients in connection with the Chapter 11 Cases, the Creditors’ Committee will be represented by Conflicts Counsel in such litigation.

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⁴ To the extent parties in interest have already been searched and disclosed in connection with the Prior Affidavits and the Exhibits thereto and their relationships have not changed, such parties and their relationships are not included herein.

14. Milbank is carrying on further inquiries of its partners, counsel, and associates with respect to the matters contained herein and in the Prior Affidavits. As indicated above, Milbank will file supplemental declarations as and if any additional relevant information comes to its attention.



ROBERT JAY MOORE

Sworn to before me this ____ day
of _____

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

State of California

County of

Los Angeles

} ss.

On

5/25/10

Date

, before me,

Bonita J. Paul Notary Public

Name and Title of Officer (e.g., "Jane Doe, Notary Public")

personally appeared

Name(s) of Signer(s)

- ☐ personally known to me
☐ proved to me on the basis of satisfactory evidence



to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.

Bonita J. Paul

Signature of Notary Public

Place Notary Seal Above

OPTIONAL

Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.

Description of Attached Document

Title or Type of Document: _____

Document Date: _____

Number of Pages: _____

Signer(s) Other Than Named Above: _____

Capacity(ies) Claimed by Signer

Signer's Name: _____

- ☐ Individual
☐ Corporate Officer — Title(s): _____
☐ Partner — ☐ Limited ☐ General
☐ Attorney in Fact
☐ Trustee
☐ Guardian or Conservator
☐ Other: _____

Signer Is Representing: _____

RIGHT THUMBPRINT
OF SIGNER
Top of thumb here

EXHIBIT A¹

Potential Parties In Interest

¹ Certain parties in interest were researched to assess whether any connections arose since the filing of the Prior Affidavits.

1. 801 Grand CDO
2. AB Svensk Exportkredit
3. Abu Dhabi Investment Authority
4. Access Flex High Yield Fund
5. Access VP High Yield Fund
6. Acton Estates, LLC
7. AG Financial Products, Inc.
8. Aladdin Relative Value Credit Master Fun Limited
9. Alliance Laundry Equipment Receivables 2005 LLC
10. Almtaler Volksbank
11. Alta CDO
12. AM International E Mac 63 Limited
13. America's Servicing Company
14. American Express
15. American Express Travel Related Services Co., Inc.
16. Anne E. Miller-Hulbert
17. Anthony J. Napolitano & Associates
18. Anton R. Valukas (Examiner)
19. AT&T Services Inc.
20. Australia National Bank
21. Autonomy Capital Research LLP
22. Autonomy Master Fund Limited
23. Autonomy Rochevera One Limtied
24. Aviva Assicurazioni S.p.A.
25. Aviva Italia S.p.A.
26. Aviva Life S.p.A.
27. Aviva Previdenza S.p.A.
28. Aviva S.p.A.
29. Aviva Vita S.p.A.
30. Banca Akros S.p.A
31. Banca Carige, S.p.A.
32. Banca Monte dei Paschi di Seina S.p.A.
33. Banca Popolare di Milano Societa Coopertiva a r.l.
34. Banco Banif, S.A.
35. Banco Bilbao Vizcaya Argentaria, S.A.
36. Banco Inversis, S.A
37. Banco Popolare Societa Coopertiva
38. Banco Popular de Puerto Rico
39. Banco Popular Espanol, S.A.
40. Banif-Banco de Investimento, S.A.
41. Bank of New York Mellon Trust Company, N.A.
42. Bank of Nova Scotia
43. Barclays Bank PLC
44. Barclays Global Investors National Association
45. Barton Springs CDO
46. Basso Capital Management L.P.
47. Bats Holdings, Inc.
48. Beaver Country Day School (The)
49. Benetton Group
50. Benetton International
51. Best Karpet
52. BHCO Master
53. BKW FMB Energie SA
54. Black River (as Black River Asset Management)
55. Black River Asia Fund Ltd.
56. Blue Angel Claims, LLC
57. Blue Point CDO
58. BlueMountain Capital Management LLC
59. BMO Nesbitt Burns, Inc
60. Brookfield Properties One WFC Co. LLC
61. Burleson, ISD
62. Caja de Castilla la Mancha Vida y Pensiones S.A. de Seguros y Reaseruros
63. Canyon Value Realization Mac 18 Ltd
64. Cap Gemini Financial Services USA, Inc
65. Capital One, N.A.
66. Carlyle Credit Partners Master Fund
67. Carlyle High Yield Partners IX, Ltd.
68. Carlyle Loan Investment
69. Casa de Ahorros y Monte De Pieda De Zaragoza Aragon y Rioja
70. CASAM ADI CD Arbitrage Fund Limited
71. Casam Adi Cd Arbitrage Fund Limited
72. Centerbridge Credit Partners LP
73. Centerbridge Credit Partners Master LP
74. Ceradyne, Inc.
75. Charles River School (The)
76. Cherry Hill CDO
77. Chinatrust Commercial Bank, et al.
78. Chris or Nancy Stovic
79. Christine Coleman
80. Chun Ip
81. City of San Antonio, acting by and through its City Public Service Board
82. City-Yuwa Partners
83. Compass Bank
84. Concordia Mac 29 Ltd
85. Corporation Trust Company
86. Corus Bank, N.A.
87. County of Westchester
88. CVI GVF (Lux) Master S.a.r.l.

89.	D.E. Shaw Composite Portfolios, LLC	133.	Gilmartin, Poster & Shafto LLP
90.	D.E. Shaw Oculus Portfolios, LLC	134.	Glencore Commodities Ltd.
91.	DCFS Trust	135.	Goldman Sachs (Asia) Finance
92.	Dell Global B.V.	136.	Goldman Sachs (Japan) Ltd.
93.	Delta Coves Venture, LLC	137.	Goldman Sachs Asset Management International,
94.	Department of Labor and Industries	138.	Goldman Sachs Asset Management, L.P.
95.	Deutsche Postbank AG	139.	Goldman Sachs Bank USA
96.	Deutscher Sparkassen Und Giroverband (The)	140.	Goldman Sachs Credit Partners
97.	Dexia Credit Local	141.	Goldman Sachs International
98.	Dexia Deutschland	142.	Goldman Sachs International Bank, Seoul Branch
99.	Dexia Kommunalbank Deutschland AG	143.	Goldman Sachs Japan Co. Ltd.
100.	Digna Sanchez	144.	Goldman Sachs Lending Partners LLC
101.	Dr. Monika Thuermer-Grant	145.	Goodmorning Shinhan Securities Co., Ltd.
102.	E*TRADE Bank	146.	Green Tree Servicing LLC
103.	Easdaq N.V. (Artur Fischer)	147.	Greystone CDO
104.	Easton Investments II	148.	Greywolf Capital Management L.P.
105.	Eaton Corporation	149.	GS Investment Strategies, LLC
106.	Eletrabel n.v./s.a.	150.	GSEF Al Nawras (Cayman) Limited
107.	Empiricurve Fund Limited	151.	GSW Grundbesitz GmbH & Co. KG
108.	Engineers-Employers Construction Industry Retirement Trust/Saginaw Police & Fire	152.	Harpen Immobilien GmbH & Co. KG
109.	Eric and Margaret Mace-Tessler	153.	Hartfield Fund Limited
110.	European Credit (Luxembourg) S.A.	154.	Hebron Academy Incorporated
111.	European Credit Management Limited	155.	Highland Capital Management, L.P.
112.	Eurosai Finanziaria Partecipazioni S.r.l.	156.	Home Loan Mortgage Corporation
113.	Evergreen Investment Management Company, LLC	157.	Hudson Castle Group
114.	Evergreen Investment Management Company, LLC	158.	ICCREA / Istituto Centrale Delle Banche Di Credito Coopertivo
115.	EXCO Operating Company, LP	159.	International Business Machines Corporation
116.	Falling US Dollar Profund	160.	International Swaps and Derivatives Association, Inc.
117.	Federal Home Loan Bank of Cincinnati /Federal Home Loan Bank	161.	Investkredit AG
118.	Federal Home Loan Bank of New York	162.	Ironbridge Aspen Collection, LLC
119.	Federal Home Loan Mortgage Corp	163.	Ironbridge Homes, LLC
120.	Federal Reserve Bank of New York	164.	Ironbridge Mountain Cottages, LLC
121.	Florida Gulf Coast University Corporation	165.	Jason Wallace
122.	FOLIOfn Investment, Inc.	166.	Jefferson Valley CDO
123.	Franklin Lincoln National Corporation	167.	JMG Capital Partners, LP
124.	Freedom Park CDO	168.	JMG Triton Offshore Fund Limited
125.	Fullerton Drive CDO	169.	Johnson, Killen & Seiler
126.	Galileo Fund Limited	170.	Juice Energy, Inc.
127.	Galliard Capital Management	171.	Jurgen Lindermann
128.	Garfield County, Colorado	172.	Jyske Bank A/S
129.	Gaselys	173.	Kalaimoku-Kuhio Development Corp.
130.	George E. Di Russo	174.	Kantatsu Co. Ltd.
131.	GFA I LLC	175.	Kensington International Limited
132.	GHB Karnten AG	176.	KeyBank National Association

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| 177. KFW Bankengruppe | 218. Natl Australia Bank Limited |
| 178. Kings River | 219. Neuberger Berman Advisers |
| 179. Kirby Estates, LLC | Management Trust for Lehman Brothers |
| 180. Korea Development Bank | High Income Bond |
| 181. Kroger Co. (The) | 220. Neuberger Berman LLC |
| 182. Lakeview CDO | 221. New Central Avenue, LLC |
| 183. Landwirtschaftliche Rentenbank | 222. New York State Common Retirement |
| 184. Laplace Fund Equities Limited (from) | Fund |
| 185. LB Rose Ranch LLC | 223. Newport Global Credit Fund (Master) |
| 186. LB/L SunCal Northlake, LLC | L.P. |
| 187. LB/L-SunCal Oak Valley, LLC | 224. Newport Global Opportunities Fund LP |
| 188. Lehman Brothers Alpha Funds PLC for | 225. Nextera Energy Power Marketing, LLP |
| Lehman Brothers US High Yield Funds | (f/k/a/ FPL Energy Power Marketing, |
| 189. Leveraged Loans Europe & Term Loans | Inc. |
| Europe | 226. Niederosterreich-Mitte |
| 190. Levine Leichtman Capital Partners Deep | 227. Nomura International PLC and its |
| Value Fund, L.P. | affiliates |
| 191. Litton Loan Servicing Limited | 228. Norma Delepine |
| Partnership | 229. North Orange Del Rio Land, LLC |
| 192. Longacre Master Fund Ltd | 230. NYFIX, Inc. |
| 193. Longacre Opportunity Fund, L.P. | 231. OCM Opportunities Fund VII Delaware, |
| 194. LSF6 Mercury REO Investments Trust | L.P. |
| Series 2008-1 | 232. Office of the U.S. Trustee |
| 195. M&G Investment Management Limited | 233. Optim Energy, LLC (f/k/a Energy Co., |
| 196. Majestic Fund Limited | LLC) |
| 197. Manufacturers and Traders Trust | 234. Palmdale Hills Property, LLC |
| Company | 235. Pantera Vive CDO |
| 198. Massdevelopment/Saltonstall Building | 236. Passavant Memorial Area Hospital |
| Redevelopment Corporation | Association |
| 199. Matthew Hudson | 237. Patricia O'Reilly |
| 200. McLennan County | 238. PB Capital Corporation |
| 201. Mediolanum Vita S.p.A. | 239. Penn Convention Center Authority |
| 202. Merrill Lynch Credit Products | 240. PEP Credit Investor L.P. |
| 203. Merrill Lynch Japan Securities Co. Ltd. | 241. Picbengro LLC |
| 204. Michigan Department of Treasury | 242. Pioneer Europe Mac 70 Ltd |
| 205. Millenium Management | 243. Polaris Software Lab Limited |
| 206. Millenium Partners | 244. Popular Gestion S.G.I.I.C., S.A. |
| 207. Millenium USA | 245. Providence TMT Special Situations |
| 208. Millennium Management | Fund L.P. |
| 209. Millennium Partners | 246. PT Bank Negara Indonesia |
| 210. Millennium USA | 247. Public Bank Berhad |
| 211. Minnesota Masonic Home Care Center | 248. Punjab National Bank |
| 212. Mitsui-MOL | 249. Putnam Investments, LLC and Affiliates |
| 213. Mizuho Investors Securities Co., Ltd. | 250. Randolph H. Emerson |
| 214. Mizuho Trust & Banking (Luxembourg | 251. Raymond F. Kravis Center for |
| S.A.) | Performing Arts (The) |
| 215. Mortgage Electronic Registration | 252. Relative European Value S.A. |
| Systems, Inc | 253. Retirement Housing Foundation |
| 216. National Agricultural Cooperative | 254. Robania CDO |
| Federation | 255. Robert A. Schoellhorn Trust |
| 217. National Australia Bank Limited | 256. Ross Financial Company |

257.	Rosslyn Investors, I LLC	302.	SunGard Expert Solutions LLC
258.	Rothorn Fund Limited (fka Man Mac Rothorn 6A Ltd)	303.	SunGard Institutional Brokerage Inc.
259.	RWE	304.	SunGard Investment Systems LLC
260.	RWE Supply & Trading GmbH	305.	Sunset Park CDO
261.	SCC Acquisitions	306.	Sutherland Asbill & Brennan LLP
262.	SCC Communities LLC / SSC	307.	TABXSPOKE SEGREGATED PORTFOLIO
263.	SCC/Palmdale LLC	308.	Taconic Capital Partners 1.5 L.P.
264.	Securitized Product of Restructured Collateral Limited	309.	Taconic Opportunity Fund L.P.
265.	Securitized Product of Restructured Collateral Ltd	310.	Tavares Square CDO
266.	SEGREGATED PORTFOLIO SPRC D- FORCE	311.	Taylor Creek
267.	Seneca Center	312.	Teachers' Retirement System of the State of Illinois
268.	Seven Brothers, LLC	313.	Tesoro SF, LLC / Tesoro
269.	Shapiro & DiCaro LLP	314.	Tetra Tech, Inc.
270.	Shiga Bank, Ltd. (The)	315.	The Commonwealth Of Pennsylvania
271.	Shinhan Investments / Shinhan	316.	The Related Companies
272.	Short Credit Master Fund, LP	317.	THL Equity Advisors VI
273.	Simeon Moreno	318.	Thomas H. Lee Equity Fund VI
274.	SJD Development Com.	319.	Tom Wolf
275.	SJD Partners, Ltd.	320.	TPG-Austin Portfolio Holdings LLC
276.	Smolanksy Fund Limited	321.	Tradewinds II CDO
277.	Solar V CDO	322.	Trinitas Hospital
278.	Springfield Associates LLC	323.	TriOptima AB
279.	Sprint Solutions, Inc	324.	U.S. Bank National Association
280.	State Bank of Long Island	325.	UBS AG
281.	State of Arizona ex rel Arizona State Treasurer	326.	US AG Bank
282.	Steven G. Holder Living Trust	327.	US Securities and Exchange Commission
283.	Steven M. Speier	328.	Versorgungswerk der Apothekerkammer Nordrhein
284.	Stone & Youngberg	329.	Volksbank Aichfeld-Murboden
285.	Stony Hill CDO	330.	Volksbank Bad Goisern
286.	Stowe CDO	331.	Volksbank Enns-St. Valentin
287.	SunCal Beaumont Heights	332.	Volksbank Feldkirchen
288.	SunCal Bickford Ranch, LLC	333.	Volksbank Gmuend
289.	SunCal Communities I, LLC	334.	Volksbank Graz-Bruck
290.	SunCal Communities III, LLC	335.	Volksbank Obersdorf-Wolkersdorf-Dt
291.	SunCal Emerald Meadows, LLC	336.	Volksbank Oetscherland
292.	SunCal Heartland LLC	337.	Volksbank Osttirol
293.	SunCal Johansson Ranch. LLC	338.	Volksbank Ried im Innkreis
294.	SunCal Marblehead, LLC	339.	Volksbank Schaerding
295.	SunCal Oak Knoll, I,LC	340.	Volksbank Slovenia
296.	SunCal PSV, LLC	341.	Volksbank Tullnerfeld eG
297.	SunCal Summit Valley, LLC	342.	Volksbank Voklabruck-Bmunden e.Gen
298.	SunCal Torrance LLC	343.	Vox Place CDO
299.	SunGard Asset Management Systems LLC	344.	Wagram
300.	SunGard Availability Services LP	345.	Waterstone Market Neutral Mac 51 Ltd
301.	SunGard Business Integration Ltd.	346.	WCG Master Fund
		347.	West Liberty Care Center
		348.	Western Digital Corporation

- 349. Westernbank Puerto Rico
- 350. WH 2005 / NIAM III East Holding OY
- 351. White Marlin CDO 2007-1
- 352. WSG Development Co.
- 353. Zwinger Opco 6 BV

EXHIBIT B

Connections To Potential Parties In Interest¹

Party In Interest	Relationship With Milbank²	Relationship With Debtors
Abu Dhabi Investment Authority	Former client on unrelated matters	Potential party in interest
Aviva Life S.p.A.	Affiliate of current client on unrelated matters	Potential party in interest
Banco Bilbao Vizcaya Argentaria, S.A.	Current client on unrelated matters	Potential party in interest
Basso Capital Management L.P.	Former client on unrelated matters	Potential party in interest
Black River Asia Fund Ltd.	Affiliate of former client of Milbank attorney on unrelated matters	Potential party in interest
DCFS Trust	Affiliate of former client on unrelated matters	Potential party in interest
Deutsche Bank Trust Company Americas	Current client on unrelated matters	Potential party in interest
Dexia Credit Local	Current client on unrelated matters	Potential party in interest
European Credit Management Limited	Affiliate of current client on unrelated matters	Potential party in interest
Evergreen Investment Management Company, LLC	Affiliate of current client on unrelated matters	Potential party in interest
Galliard Capital Management	Affiliate of current client on	Potential party in interest

¹ To the extent parties in interest have already been searched and disclosed in connection with the Prior Affidavits and the Exhibits thereto and their relationships have not changed, such parties and their relationships are not included herein.

² A “current client” is an entity for which there are, as of the Petition Date or as of the date of this Affidavit, active matters on which Milbank is engaged; a “former client” is an entity for which there were no active matters as of the Petition Date and as of the date of this Affidavit, but there may in the future be active matters; and a “former client of Milbank attorney” is an entity that was a client of a Milbank attorney prior to such attorney’s employment by Milbank.

Party In Interest	Relationship With Milbank²	Relationship With Debtors
	unrelated matters	
Goldman Sachs (Asia) Finance	Current client on unrelated matters	Potential party in interest
Goldman Sachs Asset Management, L.P.	Former client on unrelated matters	Potential party in interest
Goldman Sachs Bank USA	Current client on unrelated matters	Potential party in interest
Goldman Sachs Credit Partners	Current client on unrelated matters	Potential party in interest
Goldman Sachs International	Current client on unrelated matters	Potential party in interest
Goldman Sachs Japan	Former client of Milbank attorney on unrelated matter	Potential party in interest
Highland Capital Management L.P.	Former client of Milbank attorney on unrelated matters	Potential party in interest
International Swaps and Derivatives Association, Inc.	Current client on unrelated matters	Potential party in interest
JMG Capital Partners, LP	Former client of Milbank attorney on unrelated matters	Potential party in interest
KeyBank National Association	Current client on unrelated matters	Potential party in interest
KFW Bankengruppe	Current client on unrelated matters	Potential party in interest
Korea Development Bank	Former client on unrelated matters	Potential party in interest
Levine Leichtman Capital Partners Deep Value Fund, L.P.	Current client on unrelated matters	Potential party in interest
Manufacturers and Traders Trust Company	Current client on unrelated matters	Potential party in interest
Merrill Lynch Credit Products	Former client on unrelated matters	Potential party in interest

Party In Interest	Relationship With Milbank²	Relationship With Debtors
Merrill Lynch Credit Products	Affiliate of current client on unrelated matters	Potential party in interest
Merrill Lynch Japan Securities Co. Ltd.	Affiliate of current client on unrelated matters	Potential party in interest
New York Life Insurance Company	Former client on unrelated matters	Potential party in interest
Newport Global Credit Fund (Master) L.P.	Affiliate of former client on unrelated matter	Potential party in interest
Newport Global Opportunities Fund LP	Affiliate of former client on unrelated matter	Potential party in interest
Nomura International PLC	Current client on unrelated matter	Potential party in interest
Punjab National Bank	Former client on unrelated matters	Potential party in interest